

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Application Pursuant to 28 U.S.C. § 1782 of
OKEAN B.V. and LOGISTIC SOLUTION
INTERNATIONAL LIMITED,

Petitioners,

– to take discovery of –

CHADBOURNE & PARKE LLP,

Respondent.

Misc. No. 12-00104 (Part 1)

NOTICE OF MOTION

**ORAL ARGUMENT
REQUESTED**

PLEASE TAKE NOTICE that, upon the annexed Memorandum of Law in Support of Respondent's Motion to Quash Subpoena, the Declaration of Thomas J. Hall in Support of Respondent's Motion to Quash Subpoena dated May 8, 2012, and the exhibits thereto, the Declaration of Anna V. Putintseva in Support of Respondent's Motion to Quash Subpoena dated May 8, 2012, the Declaration of Joseph Conwell in Support of Respondent's Motion to Quash Subpoena dated May 8, 2012, and all the prior pleadings and proceedings had herein, respondent will move this Court before the Part 1 Judge, at the United States Courthouse located at 500 Pearl Street, New York, New York, at a date and time to be determined by the Court, for an order pursuant to 28 U.S.C. § 1782 and Rule 45 of the Federal Rules of Civil Procedure (i) quashing the Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action issued on behalf of petitioners Okean B.V. and Logistic Solution International Limited, (ii) vacating the *ex parte* Order issued by this Court on April 6, 2012, in the above-captioned proceeding, and (iii) granting such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Rule 6.1(b), petitioners' papers in opposition to this motion, if any, are to be served no later than May 22, 2012.

Dated: May 8, 2012

New York, New York

CHADBOURNE & PARKE LLP

By /s/ Thomas J. Hall
Thomas J. Hall
A Member of the Firm
Respondent *Pro Se*
30 Rockefeller Plaza
New York, New York 10112
Tel.: (212) 408-5100
Fax: (212) 541-5369
thall@chadbourne.com

TO: Deborah A. Skakel
DICKSTEIN SHAPIRO LLP
1633 Broadway
New York, New York 10019

Attorneys for Petitioners